

# EXHIBIT Q

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**From:** Pocha, Madhu <mpocha@omm.com>  
**Sent:** Monday, March 4, 2019 12:47 PM  
**To:** Papez, Matthew E.; pfriedman@omm.com; suhland@omm.com; McKeen (External), Elizabeth; wdalsen@proskauer.com; Dale, Margaret A.; mbienenstock@proskauer.com; JLevitan@proskauer.com; tmungovan@proskauer.com; sweise@proskauer.com; mhackett@proskauer.com; brosen@proskauer.com; Theodoridis, Chris; ppossinger@proskauer.com; kperra@proskauer.com  
**Cc:** Stewart, Geoffrey S.; Sooknanan, Sparkle L.; Bennett, Bruce S.; Rosenblum, Benjamin; Perez, Isel M.; jzakia@whitecase.com; csloane@whitecase.com  
**Subject:** RE: In re Commonwealth of Puerto Rico, et al., Case No. 17-3283 (LTS) // In re Employees Retirement System of Gov't of Commonwealth of Puerto Rico, Case No. 17-3566

Counsel -

As discussed during yesterday's call, we have been working to identify the custodians most likely to have documents responsive to the movants' document requests related to Act 106 and Joint Resolution 188. Based on our fact investigation to date, those custodians are Mohammad Yassin, Carlos Yamin and Gerry Portela. We are also determining if there are additional custodians whose files we can obtain from the Commonwealth who might have additional relevant materials.

Regarding search terms, we propose running the following set using a January 1, 2017 to September 1, 2017 date range to capture documents preceding the passage of Joint Resolution 188 and Act 106:

*(PayGo OR "R. C. de la C. 188" OR "RCC 188" OR "Ley 106" OR "Law 106" OR "Act 106" OR "Joint Resolution 188" OR "Resolución conjunta 188" OR 106) w/10 ((employer\* w/2 contribution\*) OR aportaciones)*

We also propose including Luis Collazo, ERS's Administrator, and Cecile Tirado in the search, whose files we previously collected. If you believe additional custodians are necessary, it will likely require further narrowing the search terms in order to complete the review within the time period.

Please let us know your thoughts on these terms and custodians. In addition to the email review, we are gathering responsive financial information to produce in response to Movants' requests.

Best,

Madhu

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**From:** Papez, Matthew E. <mpapez@jonesday.com>  
**Sent:** Monday, March 4, 2019 9:30 AM  
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Counsel,

We still have not yet received your proposed search terms for the Commonwealth's and ERS's production in response to Movants' RFPs. During our telephone conference yesterday afternoon, we asked you when we would receive your proposed search terms, and you said you intended to send them to us last night. It is now past noon (Eastern), and we still do not have your proposal. Please let us know why you still have not sent your proposed search terms, and when you plan to send them.

Thanks and regards,

Matt

Matthew E. Papez (bio)

Partner

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